

KRAM, S.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROBERT LOWINGER, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

GLOBAL CASH ACCESS HOLDINGS,
INC., KIRK SANFORD, KARIM
MASKATTYA, ROBERT CUCINOTTA,
M&C INTERNATIONAL, AND
SUMMIT PARTNERS, L.P., GOLDMAN
SACHS & CO., INC., AND J.P.
MORGAN SECURITIES, INC.,

Defendants.

No. 08-cv-3516 (SWK) (GWG)

ECF CASE

USDC SDNY
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STIPULATION AND PROPOSED ORDER

IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties herein, that defendants time to answer, move or otherwise respond to the Class Action Complaint filed on April 11, 2008 (the "Complaint") is extended from June 10, 2008 through and including July 11, 2008. It is further stipulated that if defendants move to dismiss the Complaint, plaintiff's response to such motion(s) shall be due on August 11, 2008 and defendants' reply shall be due on August 29, 2008. This Stipulation is without prejudice to the parties agreeing, subject to Court approval, to a further extension of time if circumstances warrant, including, for example, if lead plaintiff and lead plaintiff's counsel are not appointed by July 11, 2008. No previous requests for an extension have been made.

Dated: New York, New York
June 3, 2008

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Attorneys for Plaintiff

SO ORDERED:

Shirley Wohl Kram
Shirley Wohl Kram
U.S.D.J. *CS DT M*

Dated: New York, NY
June 6, 2008